

**FILED**

MAR 31 2020

**AO 91 (Rev. 11/11) Criminal Complaint**

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY \_\_\_\_\_  
RT \_\_\_\_\_ DEPUTY CLERK

## UNITED STATES DISTRICT COURT

for the

## Western District of Texas

United States of America

**V.**

**Karim Karn (1)**

**Amber Karn (2)**

Case No. 5:20-mj-481

Defendant(s)

# CRIMINAL COMPLAINT

**I, the complainant in this case, state that the following is true to the best of my knowledge and belief.**

On or about the date(s) of March 29, 2020 in the county of Bexar in the  
Western District of Texas, the defendant(s) violated:

### Code Section

### Offense Description

18 U.S. Code § 751(A)  
18 U.S. Code § 752 (A)

**Escape from custody**  
**Instigating or assisting escape**

**This criminal complaint is based on these facts:**

**See Attachment A**

☒ Continued on the attached sheet.

*Complainant's signature*

**Elvin Ruiz Deputy United States Marshal**

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/31/2020

*Judge's signature*

City and state: San Antonio, Texas

Henry J. Bemporad, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT FOR CRIMINAL COMPLIANT**  
In the case of  
Karim KARN and Amber KARN

Your affiant, Elvin Ruiz, being duly sworn, do hereby depose and state as follows:

I, Elvin Ruiz, am currently employed as a Deputy United States Marshal with the United States Marshals Service assigned to the San Antonio District Office in San Antonio, Texas. I have been employed by the USMS for approximately 10 ½ years. As a Deputy U.S. Marshal (DUSM) I work with federal and state law enforcement officers in the investigation of violations of federal laws, including Title 18 of the United States Code. During the course of my employment, I have been personally involved in a number of federal criminal investigations.

I have personally participated in this investigation and am thoroughly familiar with the information contained in this affidavit either through personal investigation or through discussions with other law enforcement personnel. The following information is derived from my personal observations, surveillance, and my review of physical evidence, as well as the review of reports of, and discussions with law enforcement agents and investigators who have personal knowledge of the matters covered in those reports and discussions, and from conversations with persons, further identified below, who have personal knowledge of the events described herein. All of the facts set forth below are true and correct to the best of my knowledge:

On or about March 29, 2020, KARIM KARN escaped from Karnes County Correction Center (KCCC), a facility under the direction of / contract with the Attorney General to house federal inmates. KARIM KARN had been charged via Federal indictment with a felony drug offense - 21 U.S.C. § 841(a) (1) & 841(b) (1) (A) - under San Antonio docket number SA19-CR-801. KARIM KARN was being detained at KCCC pending the resolution of this felony criminal case pursuant to an order issue by United States Magistrate Judge Chestney on November 12, 2019.

On March 29, 2020, while KARIM KARN was utilizing recreation time in the yard, he crawled under the recreation yard fence, proceeded to the maintenance area, and jumped over a barb wired fence. Once he was outside the perimeter fence, he was observed by a KCCC officer

who was monitoring the facility perimeter fence and road. The officer gave chase and attempted to stop KARIM KARN, who ran towards Highway 181. Once KARIM KARN arrived at Highway 181, witnesses observed a white vehicle waiting for him, being driven by co-defendant AMBER KARN. KARIM KARN then entered the vehicle with AMBER KARN, and the vehicle fled on Highway 181.

The Karnes County Sheriff's Office was advised of the escape and attempted to stop the vehicle on Highway 181 northbound. A vehicle chase ensued through three different counties with multiple agencies, including two helicopters, until the vehicle was stopped near Camp Bullis Road, San Antonio, Texas, 78256. Both KARIM KARN and AMBER KARN were present within the vehicle when it was stopped, and both individuals were placed under arrest.

The foregoing is true to the best of my knowledge, information, and belief.

  
ELVIN RUIZ  
Deputy United States Marshal

Subscribed and sworn before me on the 31<sup>st</sup> of March        2020.

  
Honorable Henry J. Bemporad  
United States Magistrate Judge